

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036-2601
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Scott Davidson

Special Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**SUPPLEMENT TO FIRST QUARTERLY FEE STATEMENT OF KING & SPALDING
LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED AS SPECIAL COUNSEL TO THE
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM
SEPTEMBER 16, 2019 THROUGH JANUARY 31, 2020**

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, the *Order Authorizing the Retention and Employment of King & Spalding LLP as Special Counsel for the Debtors Nunc Pro Tunc to the Petition Date*, dated November 25, 2019 [D.I. 543], and the *Order*

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, dated November 21, 2019 [D.I. 529], the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases Pursuant to General Order M-447 (Jan. 29, 2013), and the U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013, King & Spalding LLP (“**K&S**”), special counsel to the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), submits this *Supplement to First Quarterly Statement of Services Rendered and Expenses Incurred for the Period from September 16, 2019 Through January 31, 2020* (this “**Fee Statement Supplement**”).²

On March 16, 2020, K&S filed its *First Quarterly Statement of Services Rendered and Expenses Incurred for the Period from September 16, 2019 Through January 31, 2020* [D.I. 935]. By this Fee Statement Supplement, K&S discloses that the Debtors and K&S did not agree to a formal budget during the Fee Period for K&S’s work relating to DOJ opioid marketing investigations or to discovery relating to subpoena requests due to the confidential nature of K&S’ services, as well as their unpredictability on a monthly basis. Similarly, the document review universes (which make up a large part of K&S’ services) are constantly in flux and, accordingly, there was no defined universe of documents enabling K&S to predict when the document review process will end. While certain high level, rough estimates were discussed with the Debtors for certain services,³ it was not practical to prepare a budget for K&S’ services for the Fee Period.

² The period from September 16, 2019 through and including January 31, 2020 is referred to herein as the “**Fee Period**.”

³ For example, in November 2019, K&S did provide a confidential, rough estimate to the Debtors to complete work relating to the then-known universe of documents remaining to be reviewed relating to ongoing subpoena requests. However, K&S expressly stated that the estimate could change significantly based upon additional documents that may require review and analysis, and was dependent upon ongoing collections and processing.

K&S will attempt to work with the Debtors to formulate a budget for future fee periods for all services to be rendered by K&S, recognizing the continued confidential nature and unpredictability of K&S' services, and that the level of services may increase (or decrease) based on future, unknown events that are out of K&S' control.

Dated: March 23, 2020
New York, New York

/s/ Scott Davidson
Scott Davidson
King & Spalding LLP
1185 Avenue of the Americas
New York, New York 10036
(212) 556-2100
sdavidson@kslaw.com

And, additional documents were subsequently added to the universe that required review and analysis, making the estimate inaccurate and not a true prediction of K&S' services.